

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

SECOND AMENDMENT ARMS )  
(A D/B/A OF R. JOSEPH FRANZESE) )  
R. JOSEPH FRANZESE, individually )  
and d/b/a SECOND AMENDMENT ARMS, )  
ROBERT M. ZIEMAN, SR., ICARRY an )  
unincorporated Association (and )  
d/b/a of Shaun Kranish) SHAUN )No. 1:10-CV-4257  
KRANISH, individually and d/b/a )  
ICARRY, AND TONY KOLE, )  
)

Plaintiffs, )Hon. Robert M.

)Dow, Jr.

- vs -

)U.S. District

)Court Judge

CITY OF CHICAGO, a municipal )  
corporation, RAHM EMANUEL, in his)  
official capacity as Mayor of the)Hon. Sheila M.  
City of Chicago, GARRY McCARTHY, )Finnegan  
Superintendent of Police of the )U.S. Magistrate  
City of Chicago, and SUSANA )Judge  
MENDOZA, City Clerk of the City )  
of Chicago, )  
)  
)

Defendants. )

The Discovery Deposition of

ROMAN S. TAPKOWSKI,

taken in the above-entitled cause, before BERNA  
DAVIS, a Certified Shorthand Reporter in the State  
of Illinois, taken at City of Chicago, Department  
of Law, Suite 1230, 30 North LaSalle Street,  
Chicago, Illinois, 60602, on the 30th day of May,  
A.D., 2018, commencing at approximately 1:04 p.m.

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1 **firearms?**

2 A No. I was a Chicago police officer for  
3 32 years. You don't do 32 years without being  
4 accused of something.

5 **Q So the cases where you were a party you**  
6 **were, like, a defendant?**

7 A Or someone else was. Someone else there  
8 I worked with.

9 MR. TRESNOWSKI: Okay. I'm not sure how  
10 long it's been since you were last deposed, so  
11 I'll just run over some quick ground rules.

12 I'll be asking you a series of  
13 questions. You're under oath just like you would  
14 be at trial. If you don't know the answer to a  
15 question that's okay. If you don't understand a  
16 question I'm asking, let me know so that I can try  
17 to rephrase it to help you understand it.

18 Try to answer orally to the  
19 questions. If you nod or shake your head the  
20 court reporter won't be able to note that.

21 Also, for the court reporter's  
22 sake, we should try not to interrupt or talk over  
23 each other, to try to take turns speaking.

24 We can take a break at any time,

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1           A       That's correct.

2           Q       And then Number 4 on the next page says  
3       your name, your address, and says that you may be  
4       testifying about your experience with firearms and  
5       firearm education and training, experience working  
6       with Franzese, and planned involvement with SAA,  
7       and knowledge regarding laser sights. Is that  
8       correct?

9           A       That's correct.

10          Q       So I just want to ask you some  
11       questions --

12          A       Sure.

13          Q       -- about those subjects.

14          A       Sure.

15          Q       Can you talk about your experience in  
16       firearm education and training?

17          A       How far back do you want to go?

18          Q       Let's talk about, first of all, how long  
19       have you been teaching firearm classes or training  
20       classes?

21          A       Let's take that to the early '70s with  
22       the Illinois National Guard. I was a small arms  
23       instructor for the 933rd MP Company.

24                   Then we get back into training.

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1 And in probably 2006, when I taught security  
2 related courses, including armed security at  
3 Truman College. And I was working at that time  
4 for -- I'm trying to think of the name of Steve's  
5 company. It'll come to me.

6 We worked there until 2008, when  
7 Truman scrapped the security program, the entire  
8 program. So we found ourselves without work.  
9 And, at the same time, the College of Lake County  
10 reached out to us because they found themselves  
11 without an instructor when their guy died. So we  
12 just moved lock, stock, and barrel over to the  
13 College of Lake County. And that's where I had  
14 been teaching until last year. Steve died a few  
15 years ago.

16 And experience in teaching, all  
17 right. Let's -- okay.

18 I was an Illinois --

19 **Q Can I just ask what you're reading from?**

20 A Yeah. That's my telephone, if you want  
21 to see that.

22 Okay. This is in one of the  
23 manuals. I've written several manuals having to  
24 do with basic security, armed security, private

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1 investigation, concealed carry, and what have you.  
2 In fact, I even wrote a Chicago Handgun Compliance  
3 course.

4 And this is just from, like, the  
5 third page in, because I like to let my students  
6 know where I'm coming from so that they're not  
7 wondering, you know, who the hell is this guy. So  
8 I let them know. I was an Illinois law  
9 enforcement training and standards instructor for  
10 Use of Force and IDFPR, you know. Okay.  
11 Registered firearm instructor, and my number is on  
12 here, 263 triple 0 379. And I wrote the IDFPR  
13 firearms course. It's -- okay. That was for  
14 private security.

15 And I also wrote the Illinois  
16 Concealed Carry course. That one is entitled,  
17 Handgun Fundamentals. The number on that one is  
18 CCC 13A0638. And I am still a registered -- or,  
19 actually, this is a certified instructor with  
20 them. And my number is CCT13B, like in boy, 091.  
21 Also, I am -- I was a NRA certified law  
22 enforcement handgun and shotgun instructor. I  
23 took that course in 2008. And I'm currently an  
24 NRA certified range safety officer, and I'm also a

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1 range safety officer at the Conservation Club of  
2 Kenosha County in Wisconsin, Bristole Ranges.

3 So that kind of sums up what I  
4 did or what have you. And I can give you a copy  
5 of that if you need it, not today but --

6 **Q That would be great.**

7 A -- somewhere down the road.

8 **Q That would be great.**

9 MR. SIGALE: Tell you what, if you  
10 screen shot and you send it to me I can forward it  
11 to them.

12 THE WITNESS: That's wonderful. You  
13 know how to do that?

14 MR. McNULTY: We can do that later.

15 MR. SIGALE: After the dep we'll screen  
16 shot, and you'll email it over to me and then I'll  
17 get it to you guys.

18 THE WITNESS: Okay.

19 BY MR. TRESNOWSKI:

20 **Q When you say that you wrote a course --**

21 A Yes.

22 **Q -- what do you mean by that?**

23 A Okay. And we're looking at which type  
24 of course? We have several courses here. So as

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1 far as basic security --

2 MR. SIGALE: Well, hold on. Which  
3 course are you talking about?

4 MR. TRESNOWSKI: You know what, you  
5 mentioned I think two courses that you had  
6 written.

7 THE WITNESS: We'll start with basic  
8 security. I'm sure you're not totally interested  
9 in what goes on there. Then there was a private  
10 investigation course. These two are the basics,  
11 you know, the steppingstones to get to an armed  
12 security course.

13 And then the one that you would  
14 be interested in is the armed security course,  
15 which applies to both of the other two. Either  
16 side -- either one of those people, if they want  
17 to carry a gun while they're working, they have to  
18 take that course and get certified. And I'm the  
19 one that does that.

20 **Q And the requirement to take these**  
21 **courses comes from State law?**

22 A Yeah, under the Private Detective Act.  
23 It's a elongated thing. It's private detective,  
24 private security, locksmith, this, that, and the

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1 individual classes, but like, you know, a  
2 concealed carry --

3 A Basic security --

4 Q -- course --

5 Basic security is one?

6 A -- I taught. I've also taught private  
7 investigation. I have taught armed security,  
8 which is a 20-hour course, and then the concealed  
9 carry course, which is a 16-hour course. And then  
10 I have also taught --

11 And there's really no manual for  
12 the tactical courses. What I do with a tactical  
13 course is, we're going to go out on the range,  
14 we're going to see what you know, what you don't  
15 know, and we're going to determine where you  
16 belong then. And we're going to slowly move up.

17 And by the time I'm through with  
18 that, then you should be able to move on to the  
19 next phase which is, one of our major guys going  
20 out there with (indecipherable). One that was  
21 involved with GTR and another one -- I can't think  
22 of the other names right now. But those are the  
23 people that pick up on these people to take them  
24 to further training. If they don't have enough



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1 was 299.

2 **Q And for all these classes it's easier to**  
3 **go through the college to attract a large number**  
4 **of students; correct?**

5 A Yes. It was much easier. We could get  
6 larger groups, plus we have large classrooms  
7 there. The audiovisual system, the firearms  
8 training simulator. There's a lot of good things  
9 there.

10 **Q Just to complete this, how much would**  
11 **you charge for your tactical courses, tactical**  
12 **training courses?**

13 A Generally those are by the day -- the  
14 dates that you're attending. It was put together  
15 as a -- about a 22-piece program that people were  
16 taught two sections of it per time at the range.  
17 So we would go into the range for a two-hour  
18 session. And the first hour they're going to  
19 be -- well, we run them through certain safety  
20 things to make sure that they're competent enough  
21 to get out on the range. And then we take them  
22 the first hour on one particular issue that we're  
23 going to deal with, then we switch up and the next  
24 issue in the next hour.

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1                   So we're going to deal with two  
2 different things, drawing from a concealed  
3 position, what are you going to do in a close-up  
4 position such as, you know, touching your target.  
5 So that you're this far away from a person  
6 (demonstrating) and drawing your firearm and  
7 doing -- all different kinds of things; the  
8 flashlight drills.

9                   The laser, I didn't incorporate  
10 the laser drill there, but if anybody brought a  
11 laser we'd certainly work with it. And those went  
12 roughly \$60 a session, and one session would be  
13 two hours. So it would be \$60, but you're going  
14 to be doing that 11 times, you know, so.

15           **Q       You could do it 11 times or you could**  
16 **just do one session if that's what you wanted;**  
17 **correct? Or was it normal for someone to sign**  
18 **up --**

19           A       You have 22 different things that are  
20 happening, you know, that you could learn. And we  
21 were going to package together two each so that  
22 you're not bored, you're not doing the same thing  
23 for two hours. I got them out there doing one  
24 thing. We could do a refresher at any time, you

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1 he took my private detective course, and he took  
2 my armed security course, and I believe he took my  
3 concealed carry course.

4 **Q How long have you known him?**

5 A Well, I started teaching in Truman at --  
6 in 2008, so it was somewhere after that that I met  
7 him -- or the CLC, not Truman. Truman was 2006.

8 **Q And when did Mr. Franzese first talk to**  
9 **you about opening a gun store in Chicago?**

10 A I don't know. 2008, 2009, something.  
11 He mentioned it when -- after one of the classes.

12 **Q How many conversations have you had with**  
13 **him about his gun store in Chicago?**

14 A A handful, less than 10.

15 **Q Less than 10.**

16 **Did he ask you if you wanted to**  
17 **participate in the store?**

18 A He asked me if I would teach classes for  
19 his entity.

20 **Q Do you have any notes from your**  
21 **conversations with him --**

22 A No.

23 **Q -- regarding the Chicago gun store?**

24 A No.

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1           Q     Did you ever email with him about the  
2     gun store in Chicago?

3           A     No.

4           Q     You told him you were interested in  
5     participating in the Chicago store?

6           A     Yes, I did.

7           Q     Were you planning on working there  
8     full-time once the store was up and running?

9           A     Well, they had to get the store up and  
10    running.

11          Q     So you never got into conversations  
12    about how many hours a week you would work there;  
13    correct?

14          A     No. We never got that far.

15          Q     And how much did you expect to be paid  
16    for your work with the gun store in Chicago?

17          A     I didn't really put an expectation on  
18    it.

19          Q     Would you have started working there  
20    without an agreement about how much you would be  
21    paid?

22          A     Sure.

23          Q     Have you ever started working at a job  
24    without an agreement about how much you would be

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1 **paid?**

2 A To tell you the truth, I don't know --

3 Yeah. I did once. In high  
4 school I was working as a busboy for Columbia  
5 Yacht Club. And the manager asked me to come in  
6 and take care of the Yacht Club for him for a  
7 weekend because nobody was going to be there and  
8 the place was going to be closed. And I didn't  
9 make an agreement with him. I should have.

10 **Q Did you have any conversations with**  
11 **Mr. Franzese about which courses would be offered**  
12 **at the store in Chicago?**

13 A No. It's my understanding that the  
14 choice of curriculum would be mine of what we were  
15 going to put on it.

16 **Q But you didn't?**

17 A Well, I know he wanted to offer  
18 concealed carry and he was interested in any of  
19 the security related courses. But we couldn't  
20 proceed with any of that until he had some kind of  
21 authorization to do this, until he had a location.

22 I'm not going to just, yes, at  
23 what we're going to do. Let's take a look and see  
24 how it's starting out. And once we had -- we were

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1 moving in that direction I told him I would be  
2 happy to sit down and talk to him at any time. I  
3 could go on a moment's notice. I have these  
4 courses written, I have PowerPoints, I have books.  
5 I have everything that's necessary to make this  
6 thing run. I can be up and running tomorrow. I  
7 can be teaching classes tomorrow. So that part  
8 didn't bother me as long as he had someplace for  
9 me to go and teach.

10 **Q Did you ever discuss any specific**  
11 **locations for the store with Mr. Franzese?**

12 A The only location I tried to steer him  
13 into is the Union Stock Yards, because that's  
14 about as close to city center as you can get with  
15 a large amount of land, and plenty of vacant  
16 buildings, and plenty of parking. Everything he  
17 needed was there.

18 **Q So apart from the general area of the**  
19 **Union Stock Yards, you never discussed any**  
20 **specific addresses --**

21 A No.

22 **Q -- or properties with Mr. Franzese?**

23 A No.

24 **Q By the end of the first year of the**

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1 **Chicago gun store's operation, how much revenue**  
2 **would you expect to be taking in as a company from**  
3 **classes on a weekly basis?**

4 MR. SIGALE: Object as to foundation and  
5 speculation.

6 But to the extent you can  
7 answer.

8 THE WITNESS: It would depend on the  
9 classes. They were moving much better when  
10 concealed carry first started. And some of my  
11 classes -- and that's one class -- I would  
12 generate \$6,000. So if I'm doing two classes  
13 we're talking 12,000 and if there is three classes  
14 we're talking 18,000 a week.

15 BY MR. TRESNOWSKI:

16 **Q Per week?**

17 A Sure. I wouldn't teach all three, not  
18 all of it. I would work with another instructor.  
19 There are some physical limitations here, you  
20 know, like lunch or dinner, and a nap maybe at my  
21 age.

22 **Q You were basing that estimate off of**  
23 **concealed carry classes?**

24 A Right. That is off of concealed carry

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1 classes. The security classes would be smaller.

2 **Q And concealed carry did not become**  
3 **authorized in Illinois until 2013; is that**  
4 **correct?**

5 A 2013, right.

6 **Q So you wouldn't be offering concealed**  
7 **carry class in 2010 or 2011?**

8 A No. 2010 would be probably -- it  
9 wouldn't be concealed carry classes, you would  
10 probably be dealing with any of the security  
11 classes and a basic firearms class. And something  
12 like that, it would probably go for 100 or 100 and  
13 a quarter for a class like that. Because you're  
14 talking about roughly a five-hour class, and  
15 you're running pretty much along the lines of the  
16 NRA basic pistol class, although I took that class  
17 and rewrote it. So I've got it the way that I  
18 like it.

19 **Q So I was talking about the first year of**  
20 **operation for the gun store in the city, so we're**  
21 **talking maybe earlier 2010. So let's assume that**  
22 **concealed carry isn't on the books, because it**  
23 **wasn't.**

24 A Right. It wasn't concealed carry in



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1 those days, but in those days people were taking  
2 the basic course. And I remember the numbers  
3 being anywhere from 10 people to about 15 or so  
4 per class. And so what's that? That's -- you're  
5 looking at 1,200 at 10 people, and about \$1,800  
6 for 15.

7 **Q \$1,800?**

8 A Is my math good here?

9 **Q So you are \$1,800 for 15 people?**

10 A So if you round that down to about 12  
11 people, 13 people, you come up with a \$1,500  
12 number.

13 **Q And you said three classes. So 15 times**  
14 **3, that's 4,500.**

15 A That could have been. It could have  
16 worked that way if you generate enough people.  
17 Again, it's like herding cats. You've got people  
18 that want it in the evening, you've got people  
19 that want it on the weekend. But the weekend  
20 people want it with a Friday finishing Sunday,  
21 while others want it without the Friday finishing  
22 on Sunday. So, you know, you try to get enough  
23 people together in each class to make that  
24 worthwhile.

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1 That would be nice to do.

2 So, you know, once we're good to  
3 go, I can be in there and, you know, I can start  
4 teaching tomorrow. Let me get in there and get my  
5 gear set up, you know. If you don't have a  
6 screen, I have one. If you don't have a projector  
7 I have one. I have a computer. I have all this  
8 stuff. We can operate -- you know, we can get  
9 started tomorrow.

10 **Q Before you started you would want to**  
11 **have a conversation about which courses you would**  
12 **be offering; correct?**

13 A Right. I think that the most money  
14 would probably be from concealed carry courses.  
15 Concealed carry and armed security --

16 Armed security, yeah. That one  
17 and private investigation, those are the three top  
18 money makers.

19 **Q And before you start you would also want**  
20 **to make sure you have the necessary equipment for**  
21 **your classes; correct?**

22 A Sure. It would be nice to have a range,  
23 a place to actually shoot, you know. Something  
24 that's -- we're not worried about any rounds

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1           A       Because it's just as easy to use your  
2       sights. A lot of people don't like sights, they  
3       want to do this the easy way. And I don't want  
4       them to do it the easy way, do it the right way.  
5       This is what you should be doing. Then if you  
6       want to go easier with lasers it might be a little  
7       bit easier to do. But right now I would like you  
8       to hold the sights correctly, do it the right way,  
9       you know.

10                       There are tips and tricks that  
11       come with this stuff. And, you know, I've got an  
12       assortment of them to give these people.

13           **Q       So why do people use lasers if it's just**  
14       **as easy to use your sights?**

15           A       Because it's neat on TV. Darkness would  
16       be another thing. If you're -- you wake up and  
17       you're disoriented in your house, or you just come  
18       up from a sound sleep, there is something moving  
19       around in your house, you go for your gun. You  
20       get to your bedroom door and you're seeing  
21       something, you can put that laser on something and  
22       know you're going to hit them without seeing the  
23       sights. You may not even be able to see your  
24       sights, you know. How dark is it in your house?

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1 to a class. And there were two of us teaching  
2 that class.

3 **Q And how many classes were being offered**  
4 **per week?**

5 A There was only one per week. That's all  
6 that was offered. And there were two of us  
7 teaching them, like I said.

8 **Q So if there were more classes, do you**  
9 **think you'd be able to get 15 --**

10 A It's possible --

11 **Q -- per class?**

12 A -- because there was another instructor  
13 going on at that time. At the time we were there  
14 he was teaching an NRA course. And I don't know  
15 which NRA course he was teaching, but he was  
16 teaching in another part of the store.

17 We had classrooms on one end,  
18 there were classrooms on the other end. So they  
19 had different things going on on different days.

20 **Q So would it be reasonable to project**  
21 **that there would be 45 students signed up for**  
22 **classes -- signed up four classes per week at this**  
23 **store you would open in Chicago?**

24 A I would think that it would be somewhere

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1 between 30 and 45.

2 **Q Somewhere between 30 and 45.**

3 A That that would be reasonable. You're  
4 dealing with a whole week here.

5 **Q Yeah. So for a month, then, we're**  
6 **talking about 120 to 180 individual students**  
7 **signing up per month for classes?**

8 A That's possible.

9 **Q Does that seem likely, like a likely**  
10 **number?**

11 A I don't know. It depends. You know,  
12 we're talking a multiyear thing here. Back  
13 between 2010, around that time, we would be  
14 dealing with a five-hour class with range time.  
15 And then at 2013 when concealed carry kicked in,  
16 you would have the same number, that 15. But that  
17 15 could easily stretch up to 20 or 25 people for  
18 a concealed carry class, because the demand was  
19 that high at that time. And that slowly waned,  
20 but it took over a year for that to come down.

21 And I remember when I first  
22 started doing this, and in my classes I had -- it  
23 was an effort to keep my classes under 20 people.  
24 I didn't want more than 20 people. I didn't want

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1 PPA on the calendar. That's them.

2 **Q I'm sorry. And what was the time frame**  
3 **when you were there?**

4 A I don't know, just before concealed  
5 carry started. So I was with him probably for two  
6 or three years before that, two and a half years  
7 maybe.

8 **Q Prior to?**

9 A Prior to concealed carry.

10 **Q Concealed carry?**

11 A I saw things I didn't like and I wanted  
12 to step away from there before concealed carry  
13 started.

14 **Q If Mr. Franzese opened up his gun store**  
15 **in Chicago today, would you still be interested in**  
16 **participating?**

17 A Yes.

18 **Q You haven't had recent conversations**  
19 **about the --**

20 A No. No. The last conversation I had  
21 with Joe was I'm telling him, when you get things  
22 to the point that you're ready to start let me  
23 know.

24 MR. TRESNOWSKI: I think I just have one

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1 unfamiliar with the industry.

2 **Q So you're not authorized to teach this**  
3 **so-called 40-hour --**

4 A Yes, I am.

5 **Q -- State cert --**

6 **Oh, you are?**

7 A Yes. In fact, mine is probably one of  
8 the only 40-hour State, if not the only 40-hour  
9 State course, to be certified because they made me  
10 do it that way. Where everybody else could submit  
11 a 20 and get approved, they wouldn't let me do  
12 that. They made me submit a 40. So they approved  
13 the 40. That's what I have.

14 **Q I see. It says here the LEO training**  
15 **will be offered. I take that to mean law**  
16 **enforcement --**

17 A Law enforcement --

18 **Q -- officer training?**

19 A Yes.

20 **Q Is that something that you provide?**

21 A I was a -- an NRA law enforcement  
22 firearms training officer in shotgun and handgun.

23 **Q In shotgun and handgun?**

24 A Right.

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1     **Permit?**

2           A     I remember that we needed a Chicago  
3     firearms something training. I remember that.  
4     And I remember something about the permit allowing  
5     you to have one gun in the house.

6           **Q     Okay. So --**

7           A     I remember something like that.

8           **Q     -- I want you to assume, for purposes of**  
9     **this question, that prior to the Supreme Court's**  
10    **decision in McDonald versus City of Chicago, that**  
11    **people were not allowed to have handguns in their**  
12    **home with very limited exception. Okay?**

13          A     Okay.

14          **Q     I want you to further assume, for**  
15    **purposes of my question, that following the**  
16    **Supreme Court's decision in 2010 in McDonald**  
17    **versus City of Chicago that the city rewrote their**  
18    **handgun ordinance to allow people to have handguns**  
19    **in their home. Okay?**

20          A     Right.

21          **Q     I want you to further assume, for**  
22    **purposes of my question, that the City of Chicago**  
23    **conditioned such home handgun possession on the**  
24    **acquisition of something called a Chicago Firearms**



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1 Permit, which required the permit holder to have  
2 firearms training which included both classroom  
3 and range training.

4 Does anything --

5 Those assumptions, does any of  
6 that ring a bell? Does that sound familiar to  
7 you?

8 A Yeah. You're talking about Chicago  
9 Handgun Compliance Training --

10 MR. TRESNOWSKI: Object to the form.

11 MR. SIGALE: Okay. You can still answer  
12 it if you understand my question.

13 BY MR. SIGALE:

14 Q Did any of those statements that I just  
15 made to you, do they sound familiar to you? Did  
16 you know those things?

17 A Yes, I did. Chicago Handgun Compliance  
18 Training, I wrote a manual for that and we  
19 worked -- Steve and I were teaching that.

20 Q So is it fair to say that the number of  
21 Chicago residents who were taking this firearms  
22 training say went up dramatically from the number  
23 0 in 2010 after the Supreme Court decision and  
24 after the Chicago Firearms Permit became

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1     **mandatory?**

2           A     I believe our awareness of people --  
3     Chicago people taking firearms training increased  
4     at that time. Because the training that we were  
5     offering, Steve and myself, was not just in  
6     Chicago. We were working with -- also with the  
7     College of Lake County. And people from Chicago  
8     specifically requested, hey, can we get this? And  
9     we told them, absolutely, you know. What we are  
10    offering falls into this. If you look at the two  
11    trainings they're virtually identical. And if you  
12    want the compliance certificate we can give you  
13    one, but you gotta tell us you're from Chicago and  
14    you need this. And that amount went up.

15           **Q     So is it fair to say that the supreme**  
16    **Court decision in 2010, coupled with the Chicago**  
17    **Firearms Permit Ordinance shortly thereafter,**  
18    **created an entirely new market of Chicago**  
19    **residents who needed firearms training?**

20           A     I would say yes.

21           **Q     And given all the testimony, is it fair**  
22    **to say that had Second Amendment Arms been allowed**  
23    **to open in the City of Chicago during that time,**  
24    **that that training for this brand new market is**

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1 something that you would have been willing to  
2 provide through Second Amendment Arms?

3 A Yes.

4 Q And is it fair to say that you  
5 individually or you through some other instructors  
6 that you had mentioned earlier or that you would  
7 have supervised or coordinated with, Second  
8 Amendment Arms would have been willing to  
9 accommodate as many Chicago residents as Second  
10 Amendment Arms could handle --

11 A Yes.

12 Q -- to teach this class and get the  
13 training and certification for a Chicago Firearms  
14 Permit?

15 A Yes.

16 Q Is there currently a going rate for CCL  
17 instructors?

18 I know what the class costs.  
19 But if you -- someone just asked you, hey, can you  
20 come teach my class, I'll pay you X dollars per  
21 hour, is there a going rate for what X is?

22 A I don't know if there is an hourly rate.  
23 In general it's done per class. But I understand  
24 where you can have some issues with that with a

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1           Q     Okay. So, in other words, if Second  
2     Amendment Arms opened and you were running the  
3     training and had to bring in extra instructors,  
4     presumably Second Amendment Arms would be able to  
5     figure out a rate with them; right?

6           A     Yes.

7           Q     Okay. The last thing I wanted to ask  
8     you about was laser sights. Counsel asked you a  
9     lot of questions about, you know, this  
10    hypothetical, this going wrong and that going  
11    wrong and that going wrong. But it's also  
12    perfectly reasonable that when -- that someone  
13    might feel more comfortable shooting if they had a  
14    laser sight; correct?

15          A     Yes. I believe that.

16          Q     And it's also reasonable that there are  
17    scenarios where the battery works as intended, and  
18    in a home intrusion scenario that laser sight  
19    might be the extra edge to save the homeowner's  
20    life?

21          A     That's possible. Yes.

22          Q     And especially if someone has training  
23    from someone like yourself and that training kicks  
24    in at the right time; right?

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1           A       Correct.

2           Q       And it's also reasonable that the home  
3 intruder sees a laser dot on their chest and gets  
4 the heck out of there?

5           A       That's possible. Yes.

6           Q       Thus sparing the homeowner from having  
7 to shoot the firearm at all?

8           A       Yeah. That would be what would happen.

9           Q       And if the person, say in the home, is  
10 the only person in the situation with a firearm  
11 with a laser, then what you were talking about,  
12 well, whose dot is whose, doesn't apply at all;  
13 right?

14          A       That's right. There would be no  
15 confusion at that point if there is one laser  
16 light.

17          Q       Okay. And even if you would prefer that  
18 they -- strike that.

19                   Even if you prefer using regular  
20 sights yourself and not a laser, even if someone  
21 else might prefer the added feature of a laser  
22 sight, and the -- somehow in a scenario where  
23 there's lots of people, I guess, with lots of  
24 laser dots all aimed at the same general chest,

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1     though? He survived three to the head with a 22.  
2     So, I mean, three bigger calibers. I mean, just  
3     like with the laser sight, I would lean towards  
4     the training that I've had rather than rely on a  
5     mechanical object. Can we call it a mechanical  
6     thing?

7           **Q     But someone who feels -- has it**  
8     **calibrated and the batteries working and feels**  
9     **more comfortable in that situ -- feels more**  
10    **comfortable having it in such a situation, you**  
11    **don't see -- do you see any reason why that person**  
12    **should be banned from having that tool in the**  
13    **event that they might really need it?**

14           A     No. It's a personal preference the way  
15    I'm seeing it.

16                   MR. SIGALE: I don't have anything else.

17                   MR. TRESNOWSKI: I just have a few more.  
18    I don't know what time we're at.

19                   MR. SIGALE: Three minutes.

20                   MR. TRESNOWSKI: Well, feel free to  
21    interrupt when you need to.

22                   MR. SIGALE: If we need to take a break  
23    for a few minutes then we'll take a break and  
24    we'll come back and...